

FILED
JAMES H. BROWN
CLERK
04 FEB 27 AM 11:18

IN THE UNITED STATES DISTRICT COURT
FOR SOUTHERN DISTRICT OF OHIO, WESTERN
DIVISION

William D. Reynolds, Col. USAF Ret.

Plaintiff,

vs

Windell Crawford, et al.,

Defendants

Case No. C-1-01-877, removed from
Common Pleas Court, Brown County,
Ohio Case No. 20010713 by counsel
John E. Vincent.

MOTION for Judgement on the Pleadings,
by Plaintiff as described below.

1. All named Defendants in the Original Complaint were served with Summons and copy of Original Complaint on or about 11/20/2001, Case No. CVH 20010713 Brown County Common Pleas Court and all failed to file Answer within (28) days, mandated in Ohio Rules of Civil Procedure, Civ. R. 12(A), therefore, Plaintiff is entitled to Judgement on the Pleadings, as a matter of law.

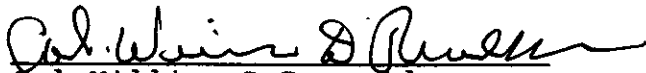
After Removal to Federal Court by counsel Vincent and Landes, on or about DEC 19, 2001 as evidenced in Certified Docket File those same named Defendants failed to file Answer under Fed. R. Civ. P. 12(a)(c), therefore Plaintiff is entitled to Judgement on the Pleadings, as a matter of law.

2. Defendants Tammy Dillinger and Bobby Gifford were added as Defendants, with permission of the Court as file stamped SEP 06, 2002.
 - a. Defendant Dillinger was served with Summons, copy of Original Complaint and a copy of COUNT TEN through counsel Vincent and Landes and all failed to file Answer pursuant to Fed. R. Civ. P. 12(a)(c), therefore, Plaintiff is entitled to Judgement on the Pleadings, as a matter of law.

b. Defendant Gifford was served with Summons, copy of Original Complaint and copy of COUNT ELEVEN through counsel Vincent and Landes but failed to file Answer pursuant to Fed.R.Civ.P.12 (a)(c), therefore Plaintiff is entitled to Judgement on the Pleadings, as a matter of law.

IT IS SO ORDERED.

Herman J. Weber, Senior Judge
United States District Court


Col. William D. Reynolds,
Plaintiff.

Counsel Vincent - Served - Before Judge
Weber 2/27/04
- When

CIVIL CASE DOCKET

CASE NO: CVH 20010713

REYNOLDS, WILLIAM D.

VS.

CRAWFORD, WINDELL

11/16/2001 CASE FILED BY REYNOLDS, WILLIAM D.
 11/16/2001 RECEIPT # 2007419 WILLIAM REYNOLDS
 11-16-2001 CLERK FEE: \$25.00; COMPUTER FEE \$10.00; LEGAL RESEARCH \$3.00
 LEGAL AID: \$15.00; MAGISTRATE \$25.00;
 11-16-2001 COMPLAINT FILED.
 CERTIFICATION.
 11-16-2001 COMPLAINT. RE: CANNOT GET FAIR AND IMPARTIAL TRIAL IN
 THE COMMON PLEAS COURT.
 CERTIFICATION.
 11-16-2001 COMPLAINT
 RE: DEMAND FOR JURY
 CERTIFICATION.
 11/19/2001 POSTAGE CHARGE
 CERTIFIED MAIL \$
 REGULAR MAIL \$.75 CERTIFICATE OF MAILING
 11/19/2001 DEMAND FOR DISCOVERY ANSWERS ARE REQUIRED NOT LESS THAN
 28 DAYS UNDER, AFTER SERVICE UPON YOU. INSTRUCTIONS
 TO THE CLERK ATTACHED
 11/19/2001 ISSUED CERTIFIED COPY OF DEMAND FOR DISCOVERY TO JANE PACK
 BY ORDINARY MAIL CERTIFICATE OF MAILING PER WILLIAM
 REYNOLDS.
 11/19/2001 POSTAGE CHARGE
 CERTIFIED MAIL \$
 REGULAR MAIL \$.57 ORDINARY MAIL
 11/19/2001 CERTIFIED COPY DEMAND FOR DISCOVERY
 11/20/2001 CERTIFICATE OF FACT UNDER SEAL OF THE COURT
 11/20/2001 ISSUED CERTIFIED COPY OF THE SUMMONS AND COMPLAINT TO
 THE COMMISSIONERS OF BROWN COUNTY, RICK HAINEY, GENO
 APBAR, DEPUTY CLARK GRAY, AND ANDREA SNIDER BY CERTIFIED
 MAIL RETURN RECEIPT REQUESTED.
 11/20/2001 ISSUED CERTIFIED COPY OF THE SUMMONS AND COMPLAINT TO
 DOG WARDEN MICHAEL DARNALL, WINDELL CRAWFORD, DEPUTY
 CHRIS SNIDER, DEPUTY LARRY MEYER, AND DEPUTY MICHELLE
 HUDEPOHOL BY CERTIFIED MAIL RETURN RECEIPT REQUESTED.
 11/20/2001 POSTAGE CHARGE
 CERTIFIED MAIL \$5.03 (10)
 REGULAR MAIL \$
 11/20/2001 COPY FEES
 16 PAGES X 10 COPIES = 160 PAGES
 160 X .25=40
 11/23/2001 RETURN RECEIPT OF DEPUTY CLARK GRAY /S/ MICKEY GREEN
 DATE OF DELIVERY 11/21/01
 11/23/2001 RETURN RECEIPT OF CORRECTIONS OFFICER DEPUTY /S/ MICKEY
 GREEN
 DATE OF DELIVERY 11/21/01
 11/23/2001 RETURN RECEIPT OF DEPUTY MICHELLE HUDEPOHOL /S/ MICKEY
 GREEN
 DATE OF DELIVERY 11/21/01
 11/23/2001 RETURN RECEIPT OF DEPUTY CHRIS SNIDER /S/ MICKEY GREEN
 DATE OF DELIVERY 11/21/01
 11/23/2001 RETURN RECEIPT OF CORRECTIONS OFFICER DEPUTY /S/ MICKEY
 GREEN
 DATE OF DELIVERY 11/21/01
 11/23/2001 THE COMMISSIONERS OF BR. CO., OHIO /S/ DONNA SMITH
 DATE OF DELIVERY 11/21/01

JO ANN KATTINE
 CLERK OF COURTS
 COURT HOUSE
 GEORGETOWN, OHIO 45121

CERTIFIED COPY
 COURT COMMON PLEAS
 BROWN COUNTY, OHIO
 CLERK JO ANN KATTINE
 DEPUTY J. H. GREEN

CIVIL CASE DOCKET

CASE NO: 20010713

VS.

11/23/2001 RETURN RECEIPT OF DOG WARDEN MICHAEL DARNALL /S/ DONNA SMITH
DATE OF DELIVERY 11/21/01

11/23/2001 RETURN RECEIPT OF DEPUTY LARRY MEYER /S/ MICKEY GREEN
DATE OF DELIVERY 11/21/01

11/23/2001 RETURN RECEIPT OF COMMUNICATIONS DISPATCHER ANDREA SNIDER
/S/ ANDREA SNIDER
DATE OF DELIVERY 11/21/01

11/26/2001 DEMAND FOR DISCOVERY UNDER CIV. R. 34 (A). ANSWERS ARE
REQUIRED NOT LESS THAN 28 DAYS UNDER CIV. R. 34 (B) AFTER
SERVICE UPON YOU.
CERTIFICATION AND INSTRUCTIONS TO THE CLERK

11/26/2001 ISSUING WRITS: ISSUED CERTIFIED COPY OF DEMAND FOR
DISCOVERY TO WINDELL CRAWFORD, SHERIFF BY CERTIFIED MAIL.
RRR.

11/26/2001 CERTIFICATE OF FACT UNDER SEAL OF THE COURT

11/26/2001 POSTAGE CHARGE
CERTIFIED MAIL \$4.57
REGULAR MAIL \$

11/27/2001 APPLIED

11/27/2001 ISSUED MARY MCMULLEN SUBPOENA DUCES TECUM BY THE SHERIFF
OF BROWN COUNTY

11/30/2001 MOTION TO QUASH SUBPOENA
CERTIFICATION
FILED BY THOMAS F. GRENNAN

11-30-2001 SHERIFF'S RETURN ON SUBPENA SERVED MARY MCMULLEN
DATE SERVED: 11-28-01

11-30-2001 RETURN RECEIPT OF WINDELL CRAWFORD /S/ WINDELL CRAWFORD
DATE OF DELIVERY 11-28-01

11/30/2001 DEMAND FOR DISCOVERY UNDER CIV. R. 34 (C). ANSWERS ARE
REQUIRED NOT LESS THAN 28 DAYS AFTER SERVICE UPON YOU.
CERTIFICATION
INSTRUCTIONS TO THE CLERK

11/30/2001 ISSUING WRITS: ISSUED A COPY TO THE PROSECUTOR'S MAIL BOX

11/30/2001 CERTIFICATE OF FACT UNDER SEAL OF THE COURT

12/05/2001 PLAINTIFF'S WITHDRAWAL OF SUBPOENA DATED 27 OCT. 2001
TO ASST. PROSECUTOR MCMULLEN
INSTRUCTIONS TO THE CLERK

12/05/2001 ISSUING WRITS: ISSUED CERTIFIED COPY TO MS. MCMULLEN AND
MR. GRENNAN BY PLACE COPIES IN THE PROSECUTOR'S BOX.

12/05/2001 CERTIFICATE OF FACT UNDER SEAL OF THE COURT

12/06/2001 RETURN RECEIPT OF WINDELL CRAWFORD /S/ WINDELL CRAWFORD
DATE OF DELIVERY 12-4-01

12-07-2001 DEMAND FOR DISCOVERY CRIM. R. 16, (A)(B)(1)(I) FILED.
CERTIFICATION.
* PROSECUTOR'S OFFICE

12-07-2001 DEMAND FOR DISCOVERY UNDER CRIM. R. 16 (A) FILED.
CERTIFICATION.
RE: SHERIFF WENNINGER

12/10/2001 DEMAND FOR DISCOVERY FILED WITH INSTRUCTIONS TO THE
CLERK AND CERTIFICATION ATTACHED.

12/10/2001 ISSUED COPY OF DEMAND FOR DISCOVERY TO THOMAS F. GRENNAN
BY PUTTING A COPY IN HIS BOX AT THE CLERK'S OFFICE BY
TF (PER WILLIAM REYNOLDS)

12/11/2001 ISSUED COPY OF THE DEMAND FOR DISCOVERY CRIM. R. 16, (A)
(B) FILED 12-7-01 TO THE BROWN COUNTY PROSECUTOR BY
PUTTING A COPY IN HIS BOX IN THE CLERK'S OFFICE.

CIVIL CASE DOCKET

CASE NO: 20010713

VS.

12/11/2001 ISSUED COPY OF THE DEMAND FOR DISCOVERY UNDER CRIM. R. 16 (A) TO SHERIFF WENNINGER BY PUTTING A COPY IN HIS BOX IN THE CLERK'S OFFICE.

12/14/2001 ANSWER TO THE DEMAND FOR DISCOVERY FILED WITH THE CLERK OF COURTS ON NOV. 19, 2001 - JANE PACK - DIRECTOR OF BR. CO. COMMUNICATIONS/E-911.

12-19-2001 NOTICE OF REMOVAL FILED.
CERTIFICATION.
EXHIBITS ATTACHED.

12-27-2001 REQUEST FOR PERSONAL OR RESIDENCE SERVICE FILED.

12-27-2001 CERTIFICATE OF FACT UNDER SEAL OF THE COURT

12-27-2001 ISSUED MOTION FOR CHANGE OF VENUE TO THE SUPREME COURT OF OHIO BY ORDINARY MAIL WITH CERTIFICATE OF MAILING.

12-27-2001 POSTAGE CHARGE
CERTIFIED MAIL \$
REGULAR MAIL \$.34 + .75 CERTIFICATE OF MAILING.

12-27-2001 MOTION FOR DEFAULT JUDGMENT PURSUANT TO CIV. R. 55 (A) FILED.
CERTIFICATION. (COPY WAS GIVEN TO SHELBY)
AFFIDVIT OF COL. WILLIAM D. REYNOLDS ATTACHED.

12/28, 2001 MOTION TO REMAND BY PLAINTIFF FILED WITH MEMORANDUM IN OF REMAND.
CERTIFICATION.
EXHIBITS ATTACHED.

01/19/2002 DISCOVERY WITH CERTIFICATION

01/28/2002 MOTION TO ORDER PRODUCTION OF DOCUMENTS, PURSUANT TO CIV. R. 37 (A) (1) (2) (3) (4) FILED.
CERTIFICATION.
* MR. REYNOLDS PUT A COPY IN THOMAS GRENNAN'S BOX IN THE CLERK'S OFFICE.

01/28/2002

01/29/2002 RESPONSE TO THE SUPREME COURT OF OHIO'S LETTER DATED 12/31/01. (FRAUD IN THE 2000 ELECTION, BROWN COUNTY, OHIO) CERTIFICATION

02-05-2002 MOTION TO AMEND ORIGINAL COMPLAINT FILE STAMPED 01 NOV. 16, PURSUANT TO CIV. R. 15 (A) FILED.
CERTIFICATION.

05/30/2002 REQUEST CASE NO. C-1-01-877 REMOVED FROM COMMON PLEAS COURT BROWN COUNTY OHIO, CASE NO 20010713 BY COUNSEL JOHN E. VINCENT FILED. CERTIFICATION

05/30/2002 COPY OF REQUEST OF REMOVAL ISSUED TO THOMAS F. GRENNAN BY MR. REYNOLDS BY PUTTING A COPY IN MR. GRENNAN'S BOX AT THE CLERK'S OFFICE